

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR	)	
Plaintiff, Pro Se	)	
	)	Case No. 5:23-CV-109
VS	)	
	)	
BRIAN MARK KRASSENSTEIN, et al	)	
<u>Defendants.</u>	)	

**PLAINTIFF MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'  
MOTION (DKT 21) TO DISMISS PURSUANT TO RULE 12(b)(6) OF THE FEDERAL  
RULES OF CIVIL PROCEDURE, AND IN THE ALTERNATIVE MOTION TO  
TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404.**

COMES NOW PLAINTIFF, Lawrence (Larry) W. Sinclair with MOTION FOR  
EXTENSION OF TIME TO RESPOND to Defendants Motion (DKT 21) filed January 30,  
2024, and states as follows:

1. First Plaintiffs wishes to note for this Court Plaintiff did email Defendants  
counsel of record seeking defendants' consent or note of their opposition to  
this motion but did not receive a response to said email. Plaintiff further  
notices this Court Defendants Counsel has not responded to any emails sent  
to him including seeking position of potential Motion to Show Cause  
demonstrating defendants named counsel of record is in reality the individual

appearing before this court and not simply serving as name for defendants use of counsel who has not sought permission to practice in or before this Court.

2. Defendants filed a Motion to Dismiss pursuant to Rule 12(b)(6) of FRCP claiming plaintiff has failed to state a claim which relief can be granted and a duplicate Alternative Motion to Transfer Venue on January 30, 2024 (DKT 21) where defendants make numerous claims and defenses.
3. Defendants motion attempts to assert and argue:
  - a. Plaintiff is a Public Figure;
  - b. Plaintiff is a Libel-Proof-Plaintiff;
  - c. Plaintiff cannot prove malice by defendants;
  - d. Defendants did not libel plaintiff;
  - e. Defendants published statements are not libel because they are true;
  - f. Plaintiff supposedly tacitly admitted at some unstated date and time he failed two polygraph tests;
  - g. That the appearance of plaintiff for a Tucker Carlson interview was to create renewed controversy about a former President of the US.
  - h. And many, many others.

Plaintiff is filing this Motion for Extension of Time to respond seeking an additional Thirty (30) days for the current filing deadline for plaintiffs' response now in the interest of conserving time and being able to provide the complete and necessary documentation exhibits and responses to this Court.

No one more than Plaintiff would like to see this action proceed at its fastest possible speed in the interest of justice and in the interest of stopping the rampant online defamation and libel defendants engage in and is using this very action as a means to defame and libel under the guise of defending their actions.

Plaintiff however prefers with the Courts indulgence, to provide actual documentation and records vs using copies or references of other people's published libel or claims in demonstrating defendants Motion pursuant to Rule 12(b)(6) cannot survive. Plaintiffs only request this additional time for the purpose of obtaining certain documents he still needs to receive from the actual administrators and guarders of said records.

Plaintiff asks this Honorable Court to understand Plaintiff did not bring this action as a jerk knee reaction, and defendants in this action are not the only ones who had been noticed and who are subject to similar action as a result of their defamation and libel. Including the publisher of material defendants inserted in their motion.

Given the weight of the decision before this Court as to defendants Motion plaintiff should be given every reasonable consideration in having the time necessary to ensure plaintiffs response is supported by factual indisputable support and documentation. Granting plaintiff, the requested addition Thirty (30) days in which to file his response does not prejudice defendants in any manner whatsoever while it does provide this Court for the fullest extent of information on which to render its ruling on the motion.

Wherefore Plaintiff respectfully asks this Honorable Court to Grant Plaintiffs Motion for Extension of Thirty (30) Additional Days from the current deadline to file plaintiffs' response setting March 15, 2024, as the deadline for Plaintiff to file his response. Plaintiff assures this Court should he be able to file sooner it will be filed in the soonest time frame possible but not later than March 15, 2024.

Submitted this 2<sup>nd</sup> day of February 2024

Respectfully Submitted,  
*Lawrence Sinclair*  
Lawrence (Larry) W. Sinclair  
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#### **CERTIFICATE OF SERVICE**

I Lawrence (Larry) W. Sinclair HEREBY certify that a true and correct copy of the foregoing **PLAINTIFFS MOTION FOR EXTENSION OF TIME** has been furnished electronically by email (because Counsel for Defendants has not yet entered his appearance in the courts electronic filing system permitting selection for ECF-CM service) Charles A. Bennett [cbennett@bennettlegal.com](mailto:cbennett@bennettlegal.com) Counsel for Defendants this 2<sup>nd</sup> day of February, 2024.

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